

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

YANPING WANG,

Defendant.

Case No. 23-CR-118 (AT)

**DECLARATION OF ROBERT  
GLENN, ESQ., IN SUPPORT OF  
DEFENDANT’S MOTION FOR AN  
ORDER REVOKING THE MAGISTRATE  
JUDGE’S ORDER OF DETENTION AND  
AUTHORIZING PRETRIAL RELEASE**

I, **ROBERT GLENN, ESQ.**, duly admitted to practice law in the courts of the States of New York, New Jersey, and the United States District Court for the District of New Jersey, pursuant to 28 U.S.C. § 1746, make the instant Declaration in Support of Defendant’s Motion for an Order Revoking the Magistrate Judge’s Order of Detention and Authorizing Pretrial Release and hereby declare as follows:

1. I am an Associate at the law firm of ChaudhryLaw PLLC, 147 W. 25<sup>th</sup> Street, 12<sup>th</sup> Floor, New York, New York 10001, a position I have held since September 2022. In that capacity, I am responsible for, *inter alia*, reviewing discovery materials in matters involving the firm’s clients.

2. Together with Lipman Law PLLC, 147 W. 25<sup>th</sup> Street, 12<sup>th</sup> Floor, New York, New York 10001, ChaudhryLaw PLLC represents Defendant Yanping Wang in the above-captioned matter.

3. On May 30, 2023, under the supervision of Special Agent Zachary Effting at the office of the Federal Bureau of Investigation (the “FBI Office”), located at 26 Federal Plaza, New York, New York 10278, I reviewed \$138,440.00 in U.S. currency the government seized from Ms. Wang’s apartment on March 15, 2023.

4. In advance of my arrival at the FBI Office, the government had laid out the currency in sixteen piles on a conference table as follows: (a) thirteen piles of 100 one-hundred-dollar bills, totaling \$130,000.00 USD; (b) one pile of forty one-hundred-dollar bills, totaling \$4,000.00 USD; (c) one pile of eighty fifty-dollar bills, totaling \$4,000.00 USD; and (d) one pile of twenty-two twenty-dollar bills, totaling \$440.00. The grand total was \$138,440.00 USD. Attached hereto as **Exhibit 1** is a true and accurate photograph of the piles of currency.

5. One pile at a time, I reviewed each bill individually to determine each bill's Series Date and catalogued the most recently dated bill from each pile. Attached hereto as **Exhibit 2** is a true and accurate copy of the catalogue in the form of a table.

6. Upon completion of my review, I found that none of the bills had been dated more recently than 2017.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 5<sup>th</sup> day of June 2023.

/s/ Robert Glenn  
Robert Glenn, Esq.

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